



No. of Copies Recd  
141 ABOVE

situations, be capable of expansion in major events and at all times protect the safety of the responding peace officers.

In many instances there are insufficient channels to provide the systems necessary. CPOA and CPCA welcomes this Proposal by the Commission, but the proposed solution appears to pose more problems than solutions. Merely attempting to force more channels into existing spectrum through reduction in power, modulation and similar measures is not the answer. In particular, the effort to insert commercial channels into spectrum presently occupied by public safety systems, as in the 150 MHz band, is a major step backwards.

Further, the elimination of block assignments for law enforcement and the further elimination of dedicated channels for state and mutual aid systems would have a very detrimental effect on the law enforcement systems now in place in California. In particular, the California Law Enforcement Mutual Aid Radio Systems (CLEMARS) has provided and continues to provide indispensable service throughout the state. The proposed rule changes would destroy this system.

While CPOA and CPCA recognizes that technical advances are making it possible to reduce bandwidth, they are at the same time resulting in the need for additional spectrum. The capability of digital communications, transfer of vital information, such as fingerprints, and photos over the air and such innovations as automatic vehicle location all add to this need for spectrum. The proposal in PR 92-235 does not address any of these needs, and in fact may preclude the use of certain technologies due to the limited bandwidths and other technical limitations prescribed.

In common with Federal agencies, California law enforcement agencies, both state and local, are faced with severe financial problems at this time. The cost of acquiring new equipment to cope with the proposed changes would present an insurmountable problem to many agencies not only now, but for several future years. Any restructuring of the public safety bands must provide adequate time frames to ensure an affordable transition. The migration plan as proposed falls far short of this vital requirement.

CPOA and CPCA are further concerned that this effort to "Reform" the spectrum used by all land mobile inclusively does not fully address the specific needs of public safety. The priorities of public safety have been guaranteed by Congress and the courts and must not be compromised for any reason.

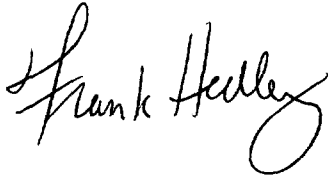
## SUMMARY AND RECOMMENDATIONS

CPOA and CPCA respectfully submit the following recommendations:

1. Provide specific portions of any new rules for public safety, separate and apart from other land mobile. Do not attempt to insert other services in spectrum contiguous to public safety.

2. Do not rely on channel width reduction alone, but provide additional spectrum for public safety use.
3. Do not require technical changes which will decrease or destroy existing law enforcement systems. Provide adequate time for amortization of existing equipment - at least seven years.
4. Carefully study and consider the technological proposals which are being submitted by qualified organizations in behalf of public safety and law enforcement in particular. We endorse the views of the Associated Public Safety Communications Officers, Inc. in this regard.

Respectfully submitted,



Frank Hedley, President  
California Peace Officers Association



Floyd Sanderson, President  
California Police Chiefs Association